

**Barton Allotment Grazing Permit Renewal
Comments and Responses to Environmental Assessment
DOI-BLM-NV-E030-2014-0010-EA**

Lowell Curtis on behalf of Pleasant Valley Grazing Association, dated 3 September 2013

Comment #1: *"...request our status on the Barton Allotment remain the same as in the past."*

BLM Response: Comment noted.

Lowell Curtis on behalf of Pleasant Valley Grazing Association, dated 7 April 2014

Comment #2: *"We request and feel that the best use for the grasses, wildlife and livestock is leaving the dates as they are now presently being managed. With my ranch in Idaho I keep the cattle there until June 1st. This gives the grasses a chance to get an adequate start at the 6000 foot elevation at the Barton Allotment. When the cattle are put in they graze most of the bottom land first where there is adequate grass on the private land because of the spring run-off in the bottom lands. Then by July 1 most of the grasses have a chance to mature and produce seed before the cattle go to the higher elevation of public lands. I met with Clay Stott, the range advisor, and discussed the standards of the Bureau of Land Management. The standards are all achievable and our goal is to continue to improve the allotment."*

BLM Response: The No Action alternative analyzes the effects of current management practices.

The American Wild Horse Preservation Campaign (AWHPC), dated 6 September 2013

Comment #3: *"Exact locations of the allotments under consideration must be provided. The current map provided by BLM Elko District Office in its August 6th 2013 scoping letter regarding the proposed grazing allotment renewals is lacking in detail sufficient to allow the reader to ascertain the exact location of the proposed allotments. The detail provided is even poorer than that provided in the BLM Elko District's map of HMAs and HAs in the district and does not even show the location of state highways or major natural features such as water bodies, as does the HMA/HA map. At minimum, the map of the proposed grazing allotment renewals must be at least as detailed as the Elko District's map of HMAs/HAs, so that the interested public can determine where the proposed allotments are in relation to those HMAs/HAs and also in relation to state highways and to natural features of the landscape".*

BLM Response: Comment noted.

Comment #4: *"BLM must provide detailed information about rangeland health in the areas where the proposed grazing allotment renewals are located. No reasoned, responsible determination about allowed AUMs can be made without first determining the current environmental health of the land on which the proposed allotments are located. As stated above, permittees have no proprietary interest in the public lands upon which they are allowed to graze*

their stock at the discretion of the Secretary of the Interior. If such grazing threatens or jeopardizes TNEB on the public lands, then AUMs should be reduced or permits retired in order to maintain or restore rangeland health. To make a reasoned determination in this regard, detailed current rangeland conditions in the area under consideration must be disclosed.”

BLM Response: This comment was received in response to a public consultation letter requesting monitoring data or information to help determine rangeland health. The Barton Allotment draft S&G Assessment has since been completed. It makes determinations about rangeland health and summarizes rangeland conditions on the allotment. There are no HMAs/HAs on the Barton Allotment.

Comment #5: *“Considering that AUM, as currently calculated, grossly underestimates (by almost 50%) the amount of forage and water usage by domestic cattle, the formula for determining AUM must be recalculated, taking into account the larger body size and correspondingly greater forage and water requirements per cow/calf pair as a result of significantly larger average body size of cattle produced in the last 25 years. Current methods for calculating AUM are woefully inadequate, and reliance on them has resulted in numbers of domestic livestock vastly exceeding carrying capacity on public lands, as well as in significant loss to taxpayers both in the form of lost revenue, and in the BLM's unnecessary, wastefully expensive, inhumane and dangerous removals of wild horses at public expense.*

BLM Response: The BLM calculates carrying capacity based on livestock numbers and utilization levels. The increasing size of cows is not a valid argument for several reasons. Average cow size varies greatly by producer, region, and forage type, and even if cattle are larger today than they were 25 years ago, the difference is still being captured by the way the BLM calculates carrying capacity. This eliminates any perceived inequity caused by the adjudication of AUMs. The cost and calculation of AUMs is beyond the scope of this document.

Comment #6: *“Any future information regarding the proposed grazing allotment renewals must fully disclose the environmental impacts on publicly owned rangelands as well as the economic impacts on taxpayers of current livestock grazing levels, and it must project likely environmental impacts on rangeland health and economic impacts on taxpayers of any proposed increase in such livestock grazing. The problem of unsustainable overgrazing of the land by privately owned livestock, resulting in a significant reduction in TNEB, must be addressed.*

BLM Response: The impacts of grazing are analyzed in the EA. There are no HMAs/HAs on the Barton Allotment.

Comment #7: *“Projected impacts of recent and projected wild horse removals which are associated with proposed continued and/ or increased grazing on HMAs/HAs on publicly owned land, including economic, legal, environmental and humane, must be fully disclosed and discussed. Alternative management options, including the options of retiring grazing permits with the aim of restoring TNEB on the public lands, as well as cessation of expensive, inhumane and ineffective wild horse removals from HMAs/HAs, must be given equal weight with other options.*

It is imperative that the BLM – each District and Field Office – begin the process of equitable distribution of resources on public lands for the federally-protected wild horses and/or burros. This grazing renewal process is one such area where the public demands a reduction in livestock grazing in order to increase the AML of wild horses in these same areas.

BLM Response: There are no HMAs/HAs on the Barton Allotment.

Western Watersheds Projected, dated 17 October 2013.

*This response was received 11 days after the end of the public comment period. This document appears to be a merge of several documents that wasn't completely finished. As such it is difficult to fully comprehend some of the points made because they appear to be out of context. These comments are summarized as they were read and understood. On page 5 of the response a new letter begins addressed to the Owyhee Field Manager. No comments are considered beyond that point because they are obviously intended for a different audience.

Comment #8: *“It is essential that an EIS be prepared to address the complexity of direct, indirect and cumulative impacts of continued levels of grazing use here and so that actions comply with NEPA, FLPMA and other laws and regulations.”*

BLM Response: See Barton Allotment FONSI. An EIS was not determined to be necessary.

Comment #9: *WWP asked for detailed maps of the project area. They also asked a series of questions about wildlife, monitoring sites, Threatened and Endangered Species, and livestock facilities.*

BLM Response: All provided or addressed in the S&G or EA.

Comment #10: *“There has been no integrated look taken at both riparian and upland values, and removal of harmful facilities to promote integrated and sound management.”*

BLM Response: All perennial riparian areas within the Barton Allotment occur on private land. Upland sites were accessed and found to be in good condition. Most livestock facilities within the allotment are also found on private ground. Those on public ground do not appear to be causing degradation.

Comment #11: *“BLM must fully and fairly examine ecological conditions related to livestock and other disturbances to soils, microbiotic crusts, watersheds, water quality, water quantity, native vegetation communities, risk of invasive species including annual or other exotic grasses, altered fire cycles due to exotic grasses and grazing impacts, native sensitive species habitats and populations, native aquatic species habitats and populations, all rare, sensitive, imperiled, and declining species and their populations, cultural values of the public lands, recreational uses including Lands with Wilderness Characteristics, aesthetic uses and enjoyment, and scientific and other pursuits on the public lands. BLM must fully and fairly consider current ecological science in assessing ecological health and native species biodiversity, and the threats to these. Risk of increased or expanded degradation with any continued livestock disturbance to sensitive lands must be thoroughly examined.”*

BLM Response: Issues addressed in the S&G/EA as needed.

Comment #12: *“Please carefully review the Beschta et al. 2012 scientific paper summarizing climate change effects that are amplified by livestock grazing disturbance. See also Interior Columbia Basin Ecosystem Sciences documents that highlight ecological concerns in the sagebrush and arid lands biomes. Example: Wisdom et al. (2002). These documents are included on a Literature cd we are mailing to you.”*

BLM Response: No literature was provided. Climate change was addressed in the EA.

Comment #13: *“We are very concerned at the recent agency trend to cherry-pick better condition sites for assessment purposes.”*

BLM Response: There is only one key area in the Barton Allotment and it has been established for over 25 years. Key areas are selected to be representative of the whole allotment. Professional observations of the allotment as a whole indicate that this key area is representative of the range conditions of the whole allotment, or, if anything, the key area maybe in slightly worse condition.

Comment #14: *“BLM must fully analyze environmental effects of the No Grazing Alternative.”
“BLM must consider a broad range of alternatives that significantly reduce grazing below levels of actual use that have been causing harms.”*

BLM Response: Addressed in the EA.

Comment #15: *In this NEPA process, Alternative actions must be designed to:
Enable passive restoration of lands “at risk” of weed invasion and/or suffering degradation or facing further losses of native species.
Provide for active restoration. Active restoration specifically includes the removal of harmful livestock facilities (and often linked roads) or other developments that may be damaging important, sensitive and imperiled species habitats, species populations, and watershed and other ecological processes.*

BLM Response: EA analysis indicated that additional livestock facilities (a pasture division fence) would be beneficial to the range, to wildlife, and to other resources. No need for “restoration” was identified.

Steve Foree, Nevada Department of Wildlife, dated 4 August 2014

Comment #16: *“...our preference would be the two pasture deferred grazing alternative. The effects of an additional north/south fence on antelope and sage grouse would be mitigated by the 3 wire configuration and fence marking. We believe that it is important to provide the native plant community the ability to respond from wild land fire events and the deferred rotation system will more adequately address this concern.”*

BLM Response: This is the selected alternative.

Comment #17: *“In review of the terms and conditions of the permit, in most instances, we see use levels applied to vegetation type, however, we don’t see wording that states that once use levels are achieved, livestock would be moved to an appropriate location within the allotment or removed from the allotment. We would like to see this addition to the terms and conditions of all permit renewals.”*

BLM Response: Utilization levels are included in the terms and conditions of the permit to establish a point of reference and to clearly state acceptable use levels. The terms and conditions of the permit contain language that includes possible consequences for exceeding utilization levels. Management based on “triggers” is highly labor intensive and is a reactive process. The Elko BLM is responsible for managing 245 allotments most of which have multiple pastures. A management system based on “triggers” is logistically untenable. The more proactive approach involves appropriate stocking levels and effective grazing systems. This permit employs both.